

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

MICHAEL MUIR,

Petitioner,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY and
TRANSPORATION SECURITY
ADMINISTRATION,

Respondents.

No. 22-1318

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE: REPLY TO RESPONDENTS' OPPOSITION TO PETITIONER'S
MOTION TO COMPEL; OPPOSITION TO RESPONDENTS'
CONDITIONAL CROSS-MOTION TO FILE PORTIONS OF THE
ADMINISTRATIVE RECORD UNDER SEAL; AND RESPONDENT DHS'S
CROSS-MOTION TO DISMISS IN PART FOR LACK OF STANDING**

Pursuant to Federal Rule of Appellate Procedure 27, Amicus respectfully moves for a 21-day extension of time to file a Reply to Respondents' Opposition to Petitioner's Motion to Compel Production of the administrative records in combination with Amicus's Response to Respondents' conditional cross-motion and Respondent DHS's cross-motion to dismiss for lack of standing. In support of this motion, Amicus submits the following:

1. Under Federal Rule of Appellate Procedure 27(a)(4), Amicus' Reply to Respondents' opposition to Petitioner and Amicus's motion to compel the

filing and production of the complete administrative records is currently due on Monday September 18, 2023.

2. Amicus is currently on parental leave, and an attorney that had been working on this matter under the supervision of amicus recently departed the law firm where Amicus is employed.
3. Respondents moved for and obtained a 21-day extension to file a response to Petitioner's motion, and then made additional cross motions along with their response, and more time will be required for Amicus to draft a Reply brief and a response to Respondents' additional cross-motions.
4. Both Petitioner and Respondents, through their counsel, have indicated that they do not oppose this motion.
5. Amicus respectfully requests 21 additional days to file the Reply in combination with Amicus's response to Respondents' cross-motions, which would result in a deadline of Monday October 9, 2023 for Amicus's brief in reply/response.

For these reasons, this Court should grant Amicus's motion for an extension of time, making Amicus's brief in Reply to Respondents' opposition brief/Amicus's response to Respondents' cross-motions due on or before October 9, 2023.

Dated: September 15, 2023

Respectfully submitted,

/s/ William R. Weaver

William R. Weaver

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Appointed Amicus Curiae for Petitioner

CERTIFICATE OF COMPLIANCE

1. I certify that the foregoing motion complies with the type-volume limitations of Fed. R. App. P. 27(d)(2)(a), excluding the items exempted by Fed. R. App. P. 32(f). The motion contains 305 words.

2. I certify that the foregoing motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it was prepared in Microsoft Word using a proportionally spaced typeface, Times New Roman 14-point font.

/s/ William R. Weaver
William R. Weaver

CERTIFICATE OF SERVICE

I certify that on September 15, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM/ECF system. Service on Petitioner will be completed by sending via electronic mail to the name and address below:

Michael Muir
muirone@yahoo.com

/s/ William R. Weaver
William R. Weaver